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May 3rd, 2023

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Edward D. Mullins*
Case No.: 1:22-cr-00120-JGK

Dear Judge Koeltl:

This office represents the defendant, Edward D. Mullins, in the above-captioned matter, wherein sentencing is currently scheduled before your Honor on May 25th, 2023. Mr. Mullins is currently enrolled, on the recommendation of his Pre-Trial Services officer, in the 12-week Focus Forward Project, a reentry-centered program for those charged with federal crimes.¹ Mr. Mullins is scheduled to graduate in early July, and would like the opportunity to both complete the program and present evidence of his successful completion to the Court at sentencing. Thus, we respectfully request an adjournment of sentencing to July 17th, 18th or 19th, or the week of July 31st or thereafter.

In the event the Court grants this adjournment request, we ask that the dates for submission of sentencing memorandums be reset accordingly.

We have discussed the foregoing request with the Government, and they have indicated that they take no position.

Respectfully submitted,

/s/Thomas A. Kenniff

Thomas A. Kenniff

cc: AUSA Alexandra Rothman (via ECF/Email: Alexandra.Rothman@usdoj.gov)
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¹ www.focusforwardproject.org